

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re:

YELLOW CORPORATION., *et al.*,¹

Debtors.

Chapter 11

Case No. 23-11069 (CTG)

(Jointly Administered)

**CREDITOR OLD REPUBLIC INSURANCE COMPANY'S
STATEMENT AND RESERVATION OF RIGHTS TO CONFIRMATION OF
DEBTORS' CHAPTER 11 PLAN**

Old Republic Insurance Company ("Old Republic"), by its undersigned attorneys, hereby files this statement and reservation of rights (the "Reservation of Rights") to the *Fourth Amended Joint Chapter 11 Plan of Yellow Corporation and its Debtor Affiliates Pursuant to Chapter 11 of the Bankruptcy Code Proposed by the Debtors and the Official Committee of Unsecured Creditors* [D.I. 5028] (the "Plan"). In support of this Reservation of Rights, Old Republic respectfully represents the following:

STATEMENT AND RESERVATION OF RIGHTS

1. As of the time of filing this Reservation of Rights, Old Republic, the Debtors, and the Official Committee of Unsecured Creditors continue to work collaboratively to resolve various issues raised by Old Republic to the proposed Plan. While Old Republic anticipates that its issues will ultimately be consensually resolved, it reserves its rights to object to the Plan in a separate objection.

2. Old Republic continues to reserve all of its rights under its policies and related policy documents and at law with respect to the terms, conditions, provisions and exclusions

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors' claims and noticing agent at <https://dm.epiq11.com/YellowCorporation>. The location of the Debtors' principal place of business and the Debtors' service address in these chapter 11 cases is: 11500 Outlook Street, Suite 400 Overland Park, Kansas 66211.

included therein, including its rights related to asserting any coverage defense potentially available for an individual claim.

3. Old Republic also reserves the right to join in, and adopt as its own, any objections to the Plan filed by any other party.

Dated: November 3, 2025

BIELLI & KLAUDER, LLC

/s/ David M. Klauder

David M. Klauder, Esquire (No. 5769)
1204 N. King Street
Wilmington, DE 19801
Phone: (302) 803-4600
Email: dklauder@bk-legal.com

- and -

FOX SWIBEL LEVIN & CARROLL LLP

Margaret M. Anderson (admitted *pro hac vice*)
Kenneth M. Thomas (admitted *pro hac vice*)
200 W. Madison Street, Suite 3000
Chicago, IL 60606
Telephone: (312) 224-1224
Facsimile: (312) 224-1201
Email: panderson@foxswibel.com
kthomas@foxswibel.com

Counsel for Old Republic Insurance Company